



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

AUG 16 2010

REPLY TO THE ATTENTION OF:

E-19J

Mr. Nick Chevance
Regional Environmental Coordinator
National Park Service
Midwest Region
601 Riverfront Drive
Omaha, Nebraska 68102-4226

Re: Draft Environmental Impact Statement / Draft General Management Plan for the Lincoln Home National Historic Site, Springfield, Illinois CEQ#: 20100221

Dear Mr. Chevance:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan (GMP) and Draft Environmental Impact Statement (DEIS), issued by the National Park Service (NPS), for the project listed above.

The DEIS/GMP presents 4 alternatives for managing the Lincoln Home National Historic Site (National Historic Site) for the next 15 to 20 years. The no-action alternative, alternative 1, describes the existing National Historic Site management and serves as a basis for comparison in evaluating the other alternatives. Alternative 2 is the NPS preferred alternative and focuses on rehabilitating the historic landscape to offer visitors a strong sense of the neighborhood as Lincoln knew it. Alternative 3 focuses on interpreting and rehabilitating the neighborhood as Lincoln knew it along the entire length of 8th St. Alternative 4 focuses on rehabilitating the landscape to provide visual cues of what was present during Lincoln's time, offering visitors a sense of self-discovery.

U.S. EPA rates the DEIS preferred alternative, alternative 2, as **LO (Lack of Objection)**. However, we do have comments about wetlands and some voluntary measures such as clean diesel initiatives and green building and sustainable design initiatives. We have enclosed the "Summary of Rating Definitions and Followup Action" to aid in your understanding of our rating system.

Wetlands

Although this project is in an urban area, there are vacant lots present at the National Historic Site. These lots could contain wetlands. Since the preferred alternative includes some

construction of buildings on the vacant lots, wetlands could be affected. However, we understand that the funding may not materialize for the buildings to be built. Therefore, in the Final Environmental Impact Statement (FEIS), we suggest committing to analyzing wetlands in detail as part of the "Implementation Plans" discussed on page 16 of the DEIS. When any portion of the GMP is going to be implemented that involves building on vacant land, the land should be delineated for wetlands and any state or federal permits should be sought then.

Green Building and Sustainable Design

We commend the NPS for committing to avoiding using fossil-fuel powered energy in the National Historic Site buildings. The practice of purchasing wind-produced energy from the local utility company and starting to employ geothermal systems in existing buildings is a great stride towards sustainable design.

In the FEIS, we suggest committing to building to Leadership in Energy and Environmental Design (LEED) standards or to E.O. 13423, "Strengthening Federal Environmental, Energy, and Transportation Management" standards.

We have also enclosed the "NEPA Stormwater Green Sheet" and the "NEPA Sustainable Materials Management Green Sheet," which can aid in your sustainable design efforts.

Clean Diesel Initiatives

In addition to the air-quality mitigation measures discussed on pages 20 and 21 of the DEIS, please also consider adding:

- construction equipment and tour buses will be shut down when not in use,
- how anti-idling measures will be enforced, and
- retrofitting all diesel powered construction equipment with diesel oxidation catalysts or diesel particulate filters.

The additional mitigation measures will further protect the health of construction workers and tourists.

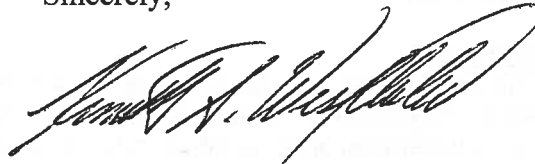
Background Information

The National Historic Site was established to preserve the site associated with the home of President Abraham Lincoln in Springfield, Illinois, the only home Mr. Lincoln ever owned. The National Historic Site is located in Sangamon County in west-central Illinois, in an urban area in the City of Springfield. The National Historic Site is bordered by E. Capitol Ave on the north, East Edwards St. on the south, S. 7th St. on the west, and S. 9th St. on the east. The

National Historic Site contains a visitor center, parking, bus drop-off, leased buildings, vacant lots, and buildings containing interpretive displays.

If you have any questions please contact Julie Guenther at (312) 886-3172 or email her at guenther.julia@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake", written in a cursive style.

Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosures (3)

Cc: Lincoln Home National Historic Site
413 South Eighth St.
Springfield, IL 62701-1905

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

NEPA Stormwater Green Sheet

Stormwater section of NEPA documents should discuss/include (at a minimum):

- ✓ Compliance with NPDES construction and post-construction requirements (project larger than one acre has to comply by writing a pollution prevention plan)
- ✓ Compliance with local ordinances
- ✓ Compliance with the Energy Independence and Security Act of 2007

"Energy Independence and Security Act of 2007" Title IV ("Energy Savings in Building and Industry"), Subtitle C "(High Performance Federal Buildings)". Here is the entire provision:

SEC. 438. STORM WATER RUNOFF REQUIREMENTS FOR FEDERAL DEVELOPMENT PROJECTS.

The sponsor of any development or redevelopment project involving a Federal facility with a footprint that exceeds 5,000 square feet shall use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow.

This provision is quite significant. It will require Federal sites to achieve/maintain the predevelopment hydrology to the "maximum extent technically feasible". Sites will need to include things like rain gardens and permeable pavements in order to do this.

Stormwater measures beyond the bare minimum:

- ✓ Mimic natural hydrology. Does the project decrease the recharge of the upper aquifer system?
- ✓ Sensitive areas should be given treatment beyond the bare minimum
- ✓ Keep native vegetation during construction and replant ASAP
- ✓ What types of salt/chemicals are being used for deicing? Latest BMP's used for deicing?
http://www.upperdesplainesriver.org/bbb_roadsalt.htm
- ✓ Sprawl is bad! Smart growth is good! Are there ways that the development can be implemented in a more compact area? www.epa.gov/ebtpages/pollsmartgrowth.html -select "pollution prevention programs" and "sustainability" for more info.
- ✓ Rain gardens, and permeable parking surfaces. Rain gardens and permeable parking surfaces increase the amount of water filtering into the ground and recharge aquifers, prevent community flooding and drainage problems, help protect waterbodies from pollutants carried by urban stormwater, and provide valuable wildlife habitat in an urban setting.
- ✓ Commitment to creating a Sustainable Buildings Implementation Plan (per Executive Order 13423) prior to construction.
- ✓ Green roofs, created wetlands, vegetated swales, native plant landscapes, and rain barrels
- ✓ Websites that can help with Stormwater Pollution Prevention and Sustainable Design:
 - Menu of stormwater BMP's: <http://cfpub1.epa.gov/npdes/stormwater/menuofbmps/>
 - Medium and small-sized model stormwater pollution prevention guides for construction sites: www.epa.gov/npdes/swpppguide
 - Green infrastructure practices (e.g. rain gardens): <http://www.epa.gov/npdes/greeninfrastructure/>
 - Some standards, including standards for individual sites: <http://www.sustainablesites.org/>
 - Standards for neighborhoods (LEED for Neighborhood Development): <http://www.usgbc.org/DisplayPage.aspx?CMSPageID=148>
 - Center for Watershed Protection: www.cwp.org
 - Low impact Development Center: www.lowimpactdevelopment.org
 - Green Alley Handbook: <http://egov.cityofchicago.org/city/webportal/home.do> -at top of page City Departments, choose Transportation, under CDOT Programs choose Green Alleys, choose Green Alleys again and scroll down for the Green Alley Handbook
 - Menu of Stormwater Best Management Practices (compost-based fact sheets, etc.): <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>

NEPA Sustainable Materials Management Green Sheet

Using recycled materials reduces the need to extract and process natural resources, which leads to significant energy savings and greenhouse gas reductions. EPA has developed emission factors that can be used to translate tons of recycled materials used into greenhouse gas savings. EPA recommends that projects track their recycled material use so that greenhouse gas savings can be quantified. Using recycled materials can save money and provide equivalent and often enhanced performance when compared to virgin materials.

Minimum Required:

Section 6002 of the Resource Conservation and Recovery Act directs procuring agencies to purchase recycled-content products designated by EPA. Procuring agencies include all federal agencies and any state or local agency or government contractor that uses appropriated federal funds and spends more than \$10,000 a year on designated items. Once a product is designated (see list of products at www.epa.gov/cpg), procuring agencies are required to purchase it with the highest recovered material content level practicable. Comprehensive Procurement Guidelines (CPG) items relevant to NEPA projects include compost made from organic waste materials; cement and concrete made with fly ash and other byproducts; flowable fill made with foundry sand; traffic barricades and cones made from recycled plastic.

Resources

Recycling of Construction and Demolition (C&D) Materials

- The *Federal Green Construction Guide for Specifiers* includes a construction waste management specification: http://www.wbdg.org/design/greenspec_msl.php?s=017419.
- WasteCap Wisconsin has case studies, training materials, specifications, and other resources for recycling C&D materials. See: <http://www.wastecapwi.org/candd.htm>

Using Recycled Materials in Construction

- The Recycled Materials Resource Center has user guidelines for many industrial byproducts and recycled materials and compiled existing national specifications. <http://www.recycledmaterials.org/tools/uguidelines/index.asp>
<http://www.recycledmaterials.org/tools/uguidelines/standards.asp>
- Case studies and additional resources are available at: www.epa.gov/industrialmaterials

Landscaping Materials with Recycled Content

- *Compost Use on State Highway Applications* provides examples and documents benefits of using compost: (www.epa.gov/epawaste/conserve/rrr/composting/highway/index.htm)
- Compost can be used as a best management practice to control run-off at a construction site: www.epa.gov/epawaste/conserve/rrr/composting/pubs/index.htm). Region 5 webinars on the use of compost to control stormwater and reduce erosion (<http://www.epa.gov/reg5rcra/wptdiv/solidwaste/recycle/compost/webinars.html>)
- EPA's GreenScapes program has information that will help to increase the purchase of recycled content landscaping materials for both the construction and maintenance phases of a project <http://www.epa.gov/epawaste/conserve/rrr/greenscapes/index.htm>

2010 Region 5 "Build for the Future" Campaign

- Region 5 will recognize organizations that use recycled materials in construction or recycle materials generated during construction when they join WasteWise, an EPA partnership program (www.epa.gov/wastewise), as part of our "Build for the Future" Campaign.
- WasteWise partners have free access to RETRAC, an online database which makes tracking progress easy. WasteWise provides a climate profile to reporting partners, translating their waste reduction results into greenhouse gas reductions. Contact: Susan Mooney at 312-886-3585 or mooney.susan@epa.gov for more information.